

EXHIBIT A

Exhibit A from the proposed settlement in Superior Court of Sussex County
case captioned Cuppels v. Mountaire Corporation, et al., C.A. No.: S18C-06-009 CAK

EXHIBIT A

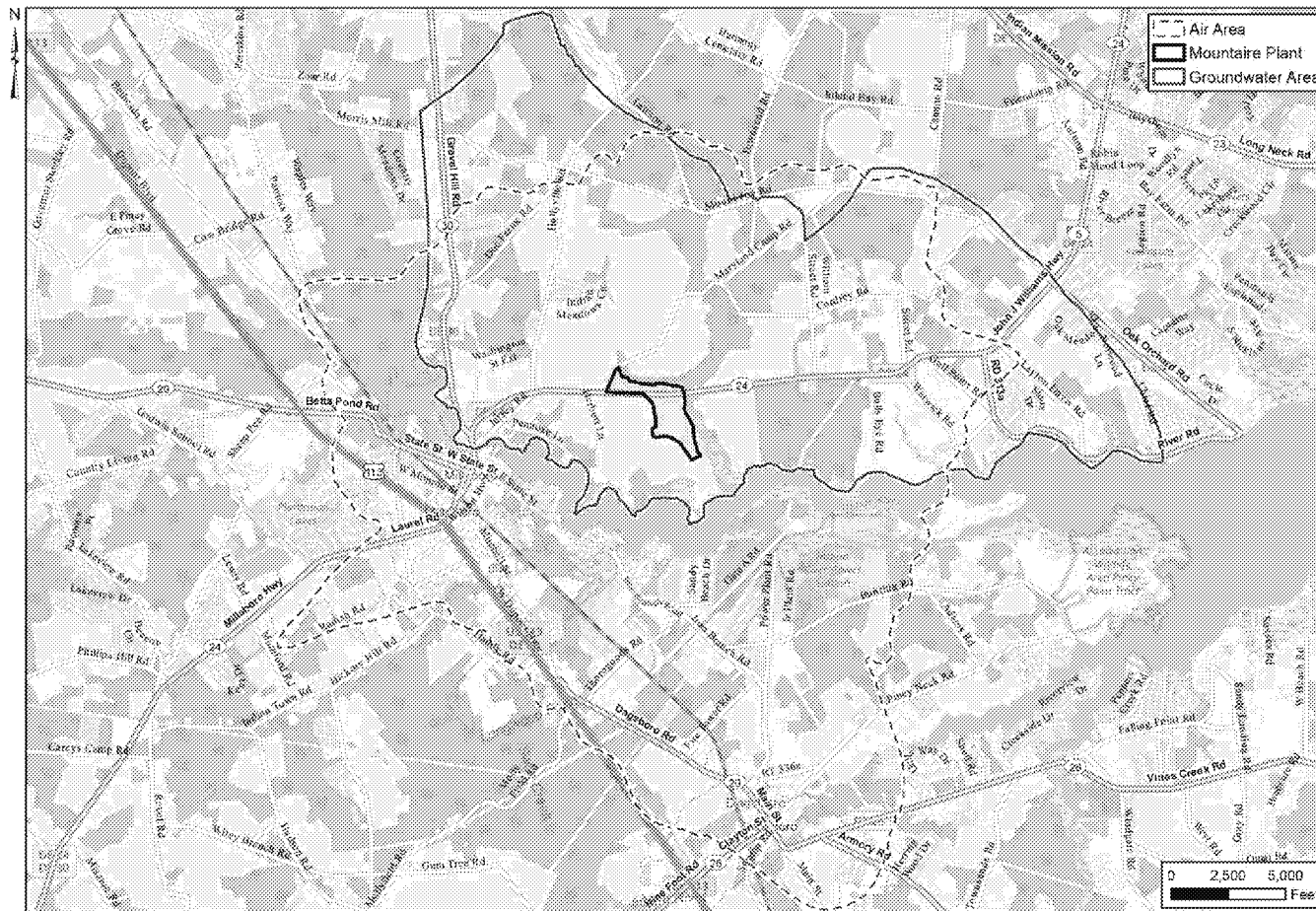


EXHIBIT B

Broader area map with overlay of Exhibit A and parcels with active dumping

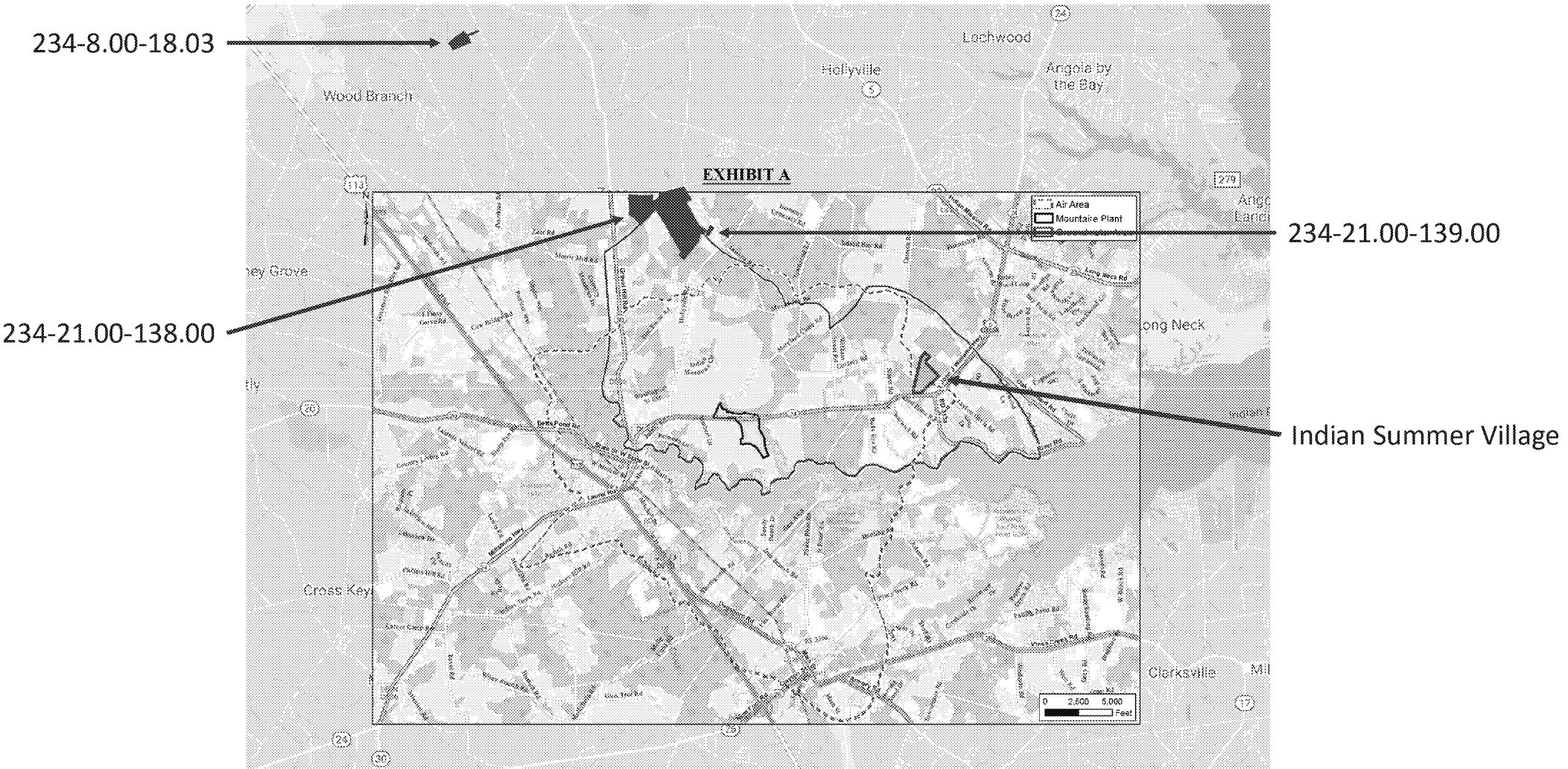


EXHIBIT C-1

Elevation map corresponding to areas of active dumping. Indian Summer Village, where my home is located, is downgradient of all three dump areas.



Active ongoing dump sites

Indian Summer Village

EXHIBIT C-2

Map showing ongoing dumping areas with blue arrows marking elevation cross-sections shown in Exhibit C-3.

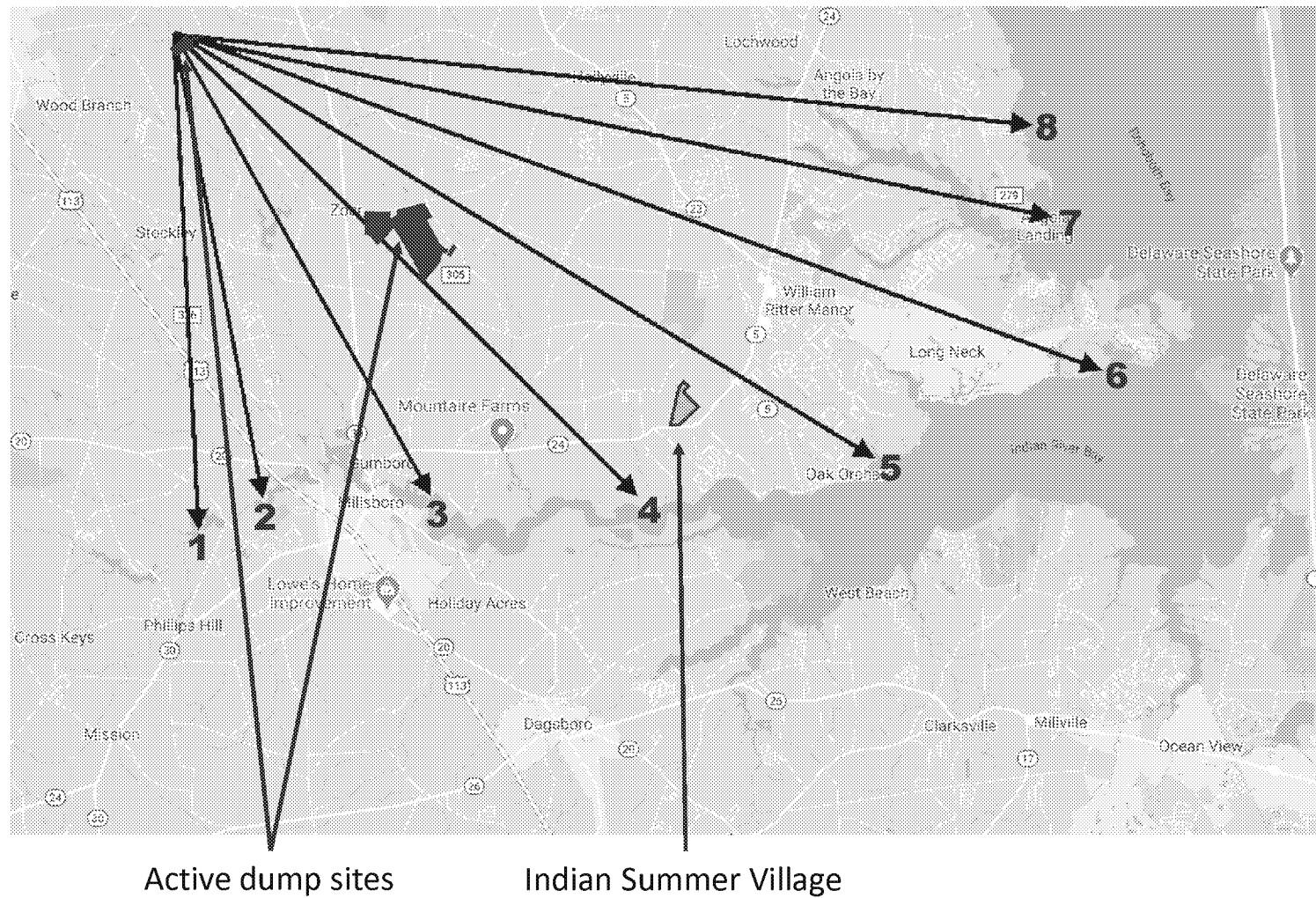


EXHIBIT C-3

Land elevation profiles along lines emanating from the northernmost active dump site and ending at various points along Indian River and Rehoboth Bay indicate drainage to each of these locations. Indian Summer Village, where my home is located, lies between lines 4 and 5 in the center of the groundwater flow of all three dump areas and likely within the highest impact zone. However, the inset map identifies a much broader area of potential impact.

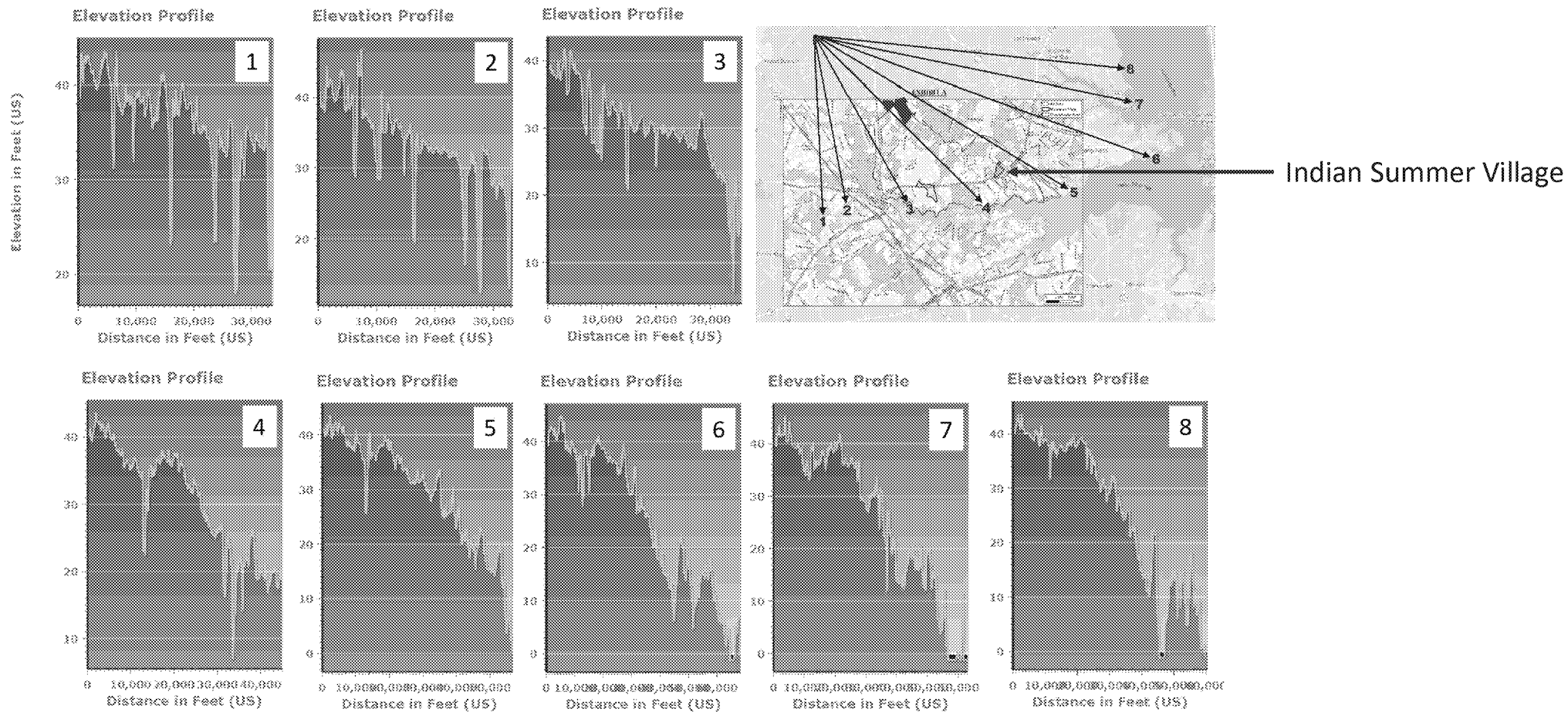


EXHIBIT D-1

Parcel 234-21.00-139.00 profile



SUSSEX COUNTY
DELAWARE

[CONTACT US](#) | 

[Home](#) [Property Records Search](#) ▼

Profile

Sales

Owners

Land

Agriculture

Residential

Outbuildings

Values

Permits

Sketch

Map

Documents

PARID: 234-21.00-139.00

RB HAULING INC

ROLL: RP

Property Information

Property Location:

Unit:

City:

State:

Zip:

Class: AGR-Agriculture

Use Code (LUC): AG-AG

Town: 00-None

Tax District: 234 - INDIAN RIVER

School District: 1 - INDIAN RIVER

Council District: 3-Schaeffer

Fire District: 83-Millsboro

Deeded Acres:

Frontage: 0

Depth: .000

In Lot:

Zoning 1: AR-1-AGRICULTURAL/RESIDENTIAL

Zoning 2: -

Plot Book Page: /PB

100% Land Value: \$800

100% Improvement Value

100% Total Value

1 of 1

[Return to Search Results](#)

Actions

 [Printable Summary](#)

 [Printable Version](#)

EXHIBIT D-2

Parcel 234-21.00-139.00 map

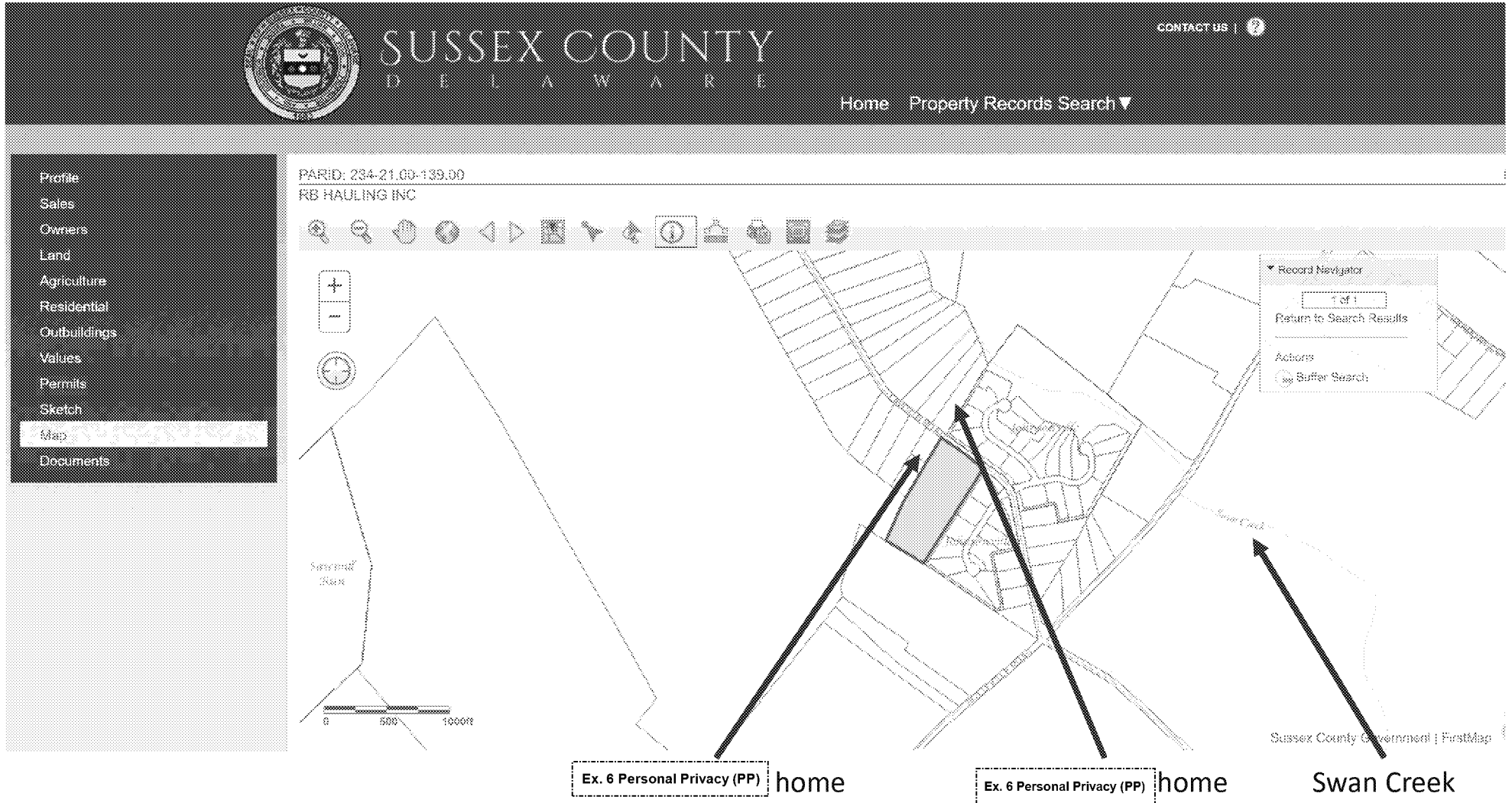


EXHIBIT D-3

No permits found for Parcel 234-21.00-139.00



SUSSEX COUNTY
DELAWARE

CONTACT US | ?

Home Property Records Search ▼

Profile
Sales
Owners
Land
Agriculture
Residential
Outbuildings
Values
Permits
Sketch
Map
Documents

PARID: 234-21.00-139.00

ROLL: RP

RS HAULING INC

-- No Data --

1 of 1

Return to Search Results

Actions

Printable Summary

Printable Version

EXHIBIT D-4

Parcel ID: 234-21.00-139.00 close up

June 2018
Most recent satellite image



Inset of June 2018 satellite image showing active dumping in progress. Details provided on Exhibit D-5.



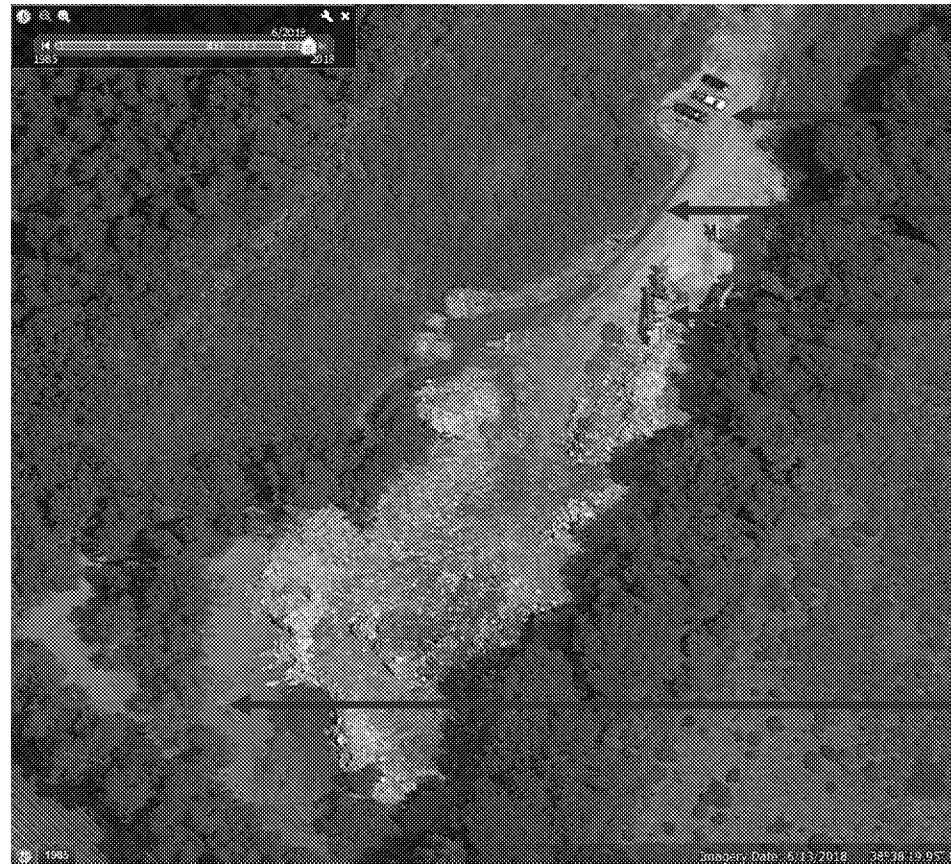
EXHIBIT D-5

Parcel ID: 234-21.00-139.00 detail

This area is of immediate grave concern to directly adjacent residents who are currently sustaining serious injury.

June 2018 satellite image showing dumping in progress.

According to witnesses, trucks with tanks enter this area two or three times per week.



Trucks

Trench

Heavy Equipment

Man-Made Pond

This site appears to have been deforested in such a way as to block view from the road.

In this image trucks appear to be blocking the view from the northeast entrance located on Lawson Rd.

Currently (not shown) there is a barricade of concrete boulders situated so as to block view from the adjacent property to the northwest.

EXHIBIT E-1

Parcel 234-21.00-138.00 profile



SUSSEX COUNTY

DELAWARE

[CONTACT US](#) | 

[Home](#) | [Property Records Search](#) ▼

[Profile](#)

[Sales](#)

[Owners](#)

[Land](#)

[Agriculture](#)

[Residential](#)

[Outbuildings](#)

[Values](#)

[Permits](#)

[Sketch](#)

[Map](#)

[Documents](#)

PARID: 234-21.00-138.00

MMW INVESTMENTS LLC

ROLL: RP

28554 ZOAR RD

Property Information

Property Location:	28554 ZOAR RD
Unit:	
City:	GEORGETOWN
State:	DE
Zip:	19947
Class:	AGR-Agriculture
Use Code (LUC):	WD0-WOODLAND PROGRAM A-I
Town:	00-None
Tax District:	234 - INDIAN RIVER
School District:	1 - INDIAN RIVER
Council District:	3-Schaeffer
Fire District:	83-Millsboro
Deeded Acres:	346.0000
Frontage:	0
Depth:	.000
In Lot:	
Zoning 1:	AR-1-AGRICULTURAL/RESIDENTIAL
Zoning 2:	-
Plot Book Page:	240 2/PB
100% Land Value:	
100% Improvement Value:	\$9,600
100% Total Value:	

1 of 1

[Return to Search Results](#)

Actions

 [Printable Summary](#)

 [Printable Version](#)

EXHIBIT E-2

Parcel 234-21.00-138.00 map



SUSSEX COUNTY

DELAWARE

[CONTACT US](#) | 

[Home](#) [Property Records Search](#) ▼

Profile

Sales

Owners

Land

Agriculture

Residential

Outbuildings

Values

Permits

Sketch

Map

Documents

PARID: 234-21.00-138.00

MMW INVESTMENTS LLC

26554



Record Navigator

1 of 1

[Return to Search Results](#)

Actions

[Buffer Search](#)

Sussex County Government | FirstMap

EXHIBIT E-3

Outdated Permit for Land Application of Sludge for Parcel 234-21.00-138.00
The 07-NOV-2013 permit date is incorrect. According to Ann Lepore of
Sussex County Council Planning & Zoning, the correct permit date is from October 1993.



SUSSEX COUNTY
DELAWARE

CONTACT US | ?

Home Property Records Search ▼

Profile

Sales

Owners

Land

Agriculture

Residential

Outbuildings

Values

Permits

Sketch

Map

Documents

PARID: 234-21.00-138.00

ROLL: RP

MMW INVESTMENTS LLC

26564 ZOAR RD

Permit Details

Permit Date:	Permit #:	Amount:	Note 1
21-JUN-2016	201606813	\$0	ELECTRICAL SUBSTATION
07-NOV-2013	201313818	\$0	LAND APPLICATION OF SLUDGE

1 of 1

Return to Search Results

Actions

Printable Summary

Printable Version

EXHIBIT E-4

Regarding Superior Court of Sussex County case captioned Cuppels v. Mountaire Corporation, et al., C.A. No.: S18C-06-009 CAK, this area was included in the groundwater settlement area, but not cited and fined in Notice of Violation W-17-GWD-13.

Regardless of who is currently dumping in this area, citizens, including myself are actively being greatly affected.

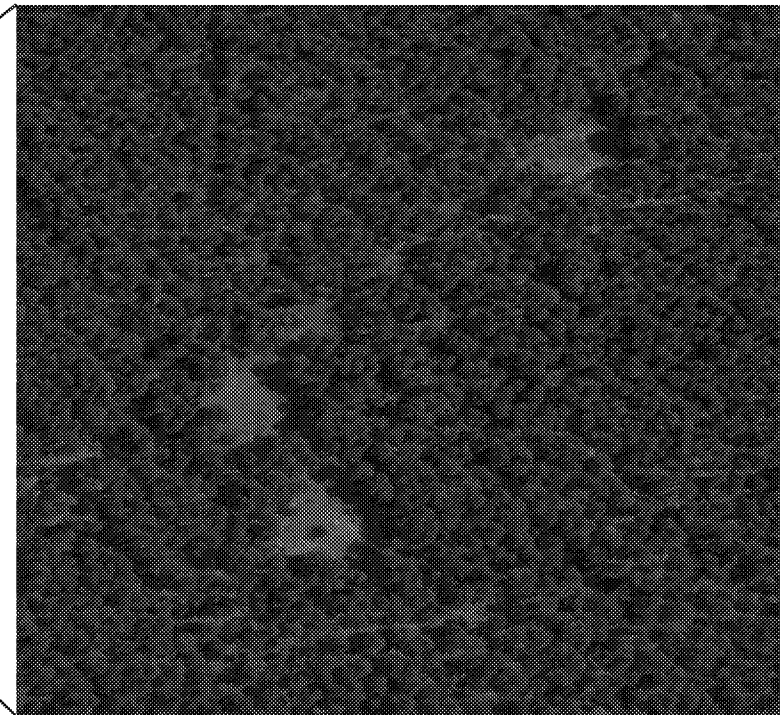
Parcel ID: 234.00-138.00

June 2018

Most recent satellite image



Inset of June 2018 satellite image.



Location of photographs and evidence gathered of apparent abandoned and ongoing illegal dumping.

EXHIBIT E-5

Parcel 234.00-138.00

February 2021 photograph of recent tracks leading back to active dumping pond.

Fresh vehicle tracks indicate dumping had recently occurred. This parcel is within the northernmost water settlement area, but not cited in Notice of Violation W-17-GWD-13 for having illegally dumped.

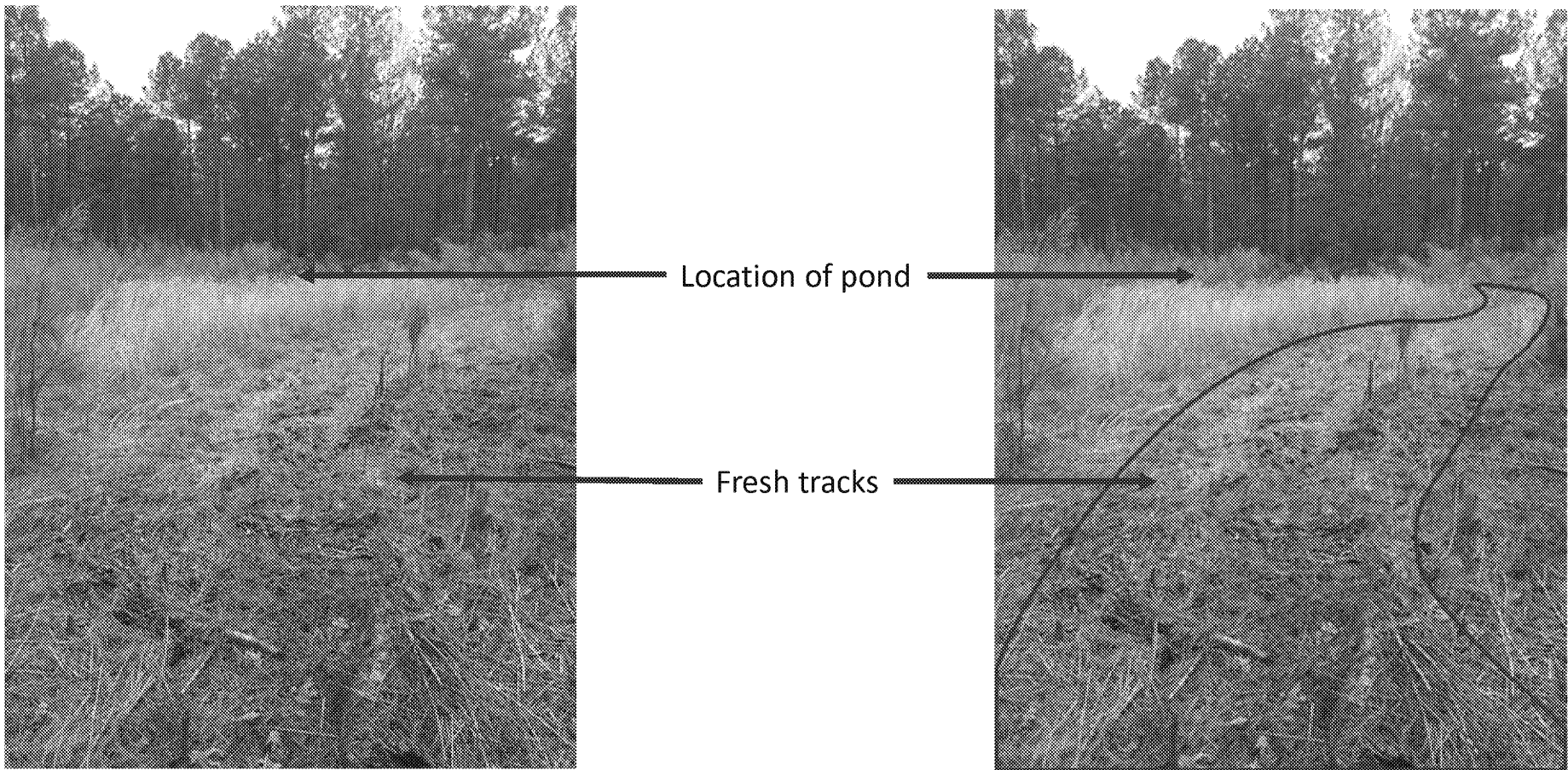


EXHIBIT E-6

Parcel 234.00-138.00

February 2021 photograph of recent tracks leading back to an active dumping pond. Within a two-day time period fresh vehicle tracks appeared, debris was removed, and paths and open areas showed further clearing.



Location of recently used
dumping pond

Abandoned mound
indicating apparent
dumping

Fresh vehicle tracks in
cleared area

EXHIBIT E-7

Parcel 234.00-138.00

February 2021 photograph of recently cleared path through woods



Fresh vehicle tracks

EXHIBIT E-8

February 2021 photograph showing example of abandoned dumping found throughout the woods.

Parcel 234.00-138.00



Abandoned mounds indicating
apparent dumping along trail

Tree growth shows this area was
used in the recent past

EXHIBIT E-9

February 2021 photograph showing recently cleared path
and examples of abandoned dumping found throughout the woods

Parcel 234.00-138.00

Abandoned mounds indicating
apparent dumping along trail

Path leading to areas with
apparent recent dumping

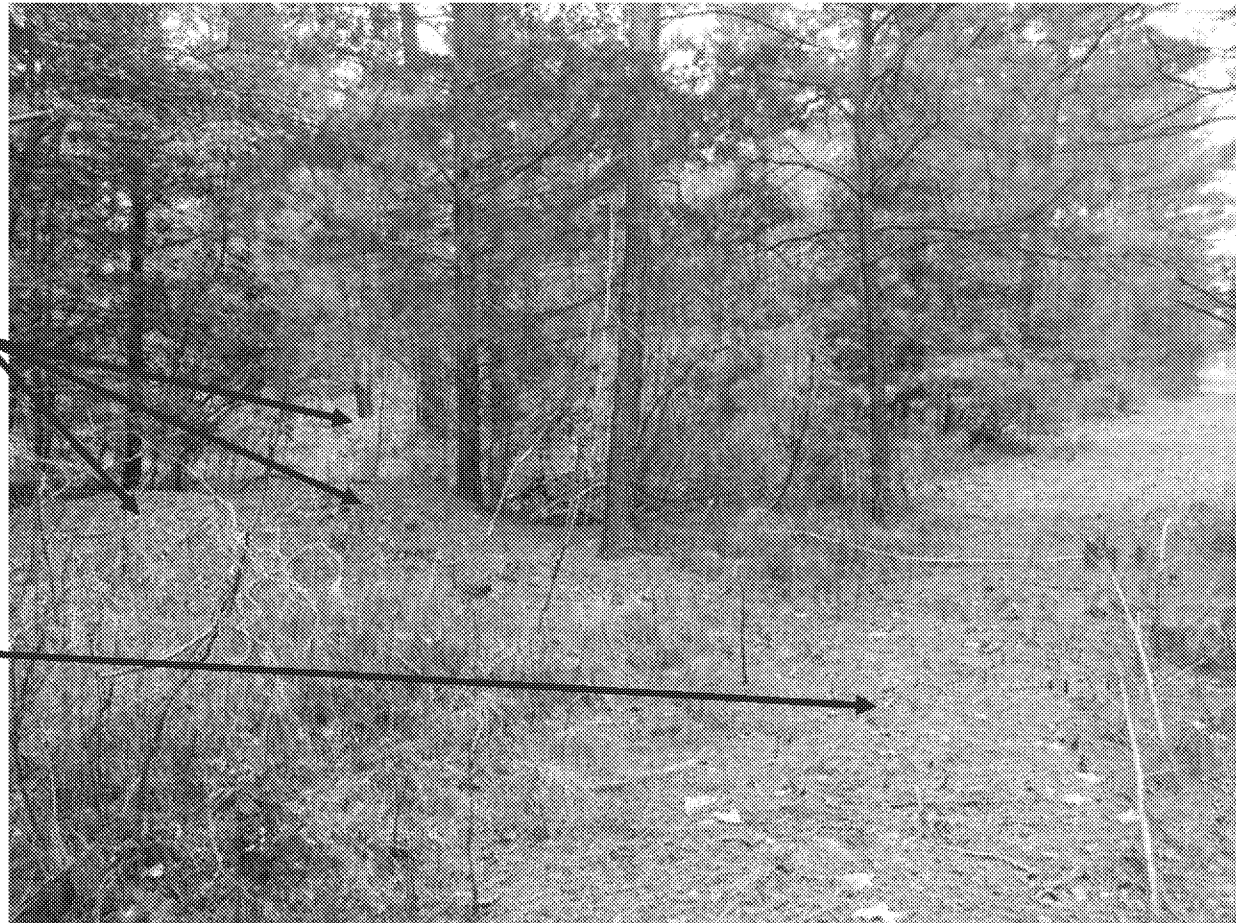


EXHIBIT E-10

February 2021 photograph showing example of abandoned dumping found throughout the woods

Parcel 234.00-138.00



Abandoned pile

EXHIBIT E-11

February 2021 photograph showing example of abandoned dumping found throughout the woods
Parcel 234.00-138.00

Abandoned piles



EXHIBIT E-12

February 2021 photograph showing example of abandoned dumping found throughout the woods

Parcel 234.00-138.00



Abandoned piles

EXHIBIT E-13

February 2021 photograph of well head in area of active dumping



Photo taken in parcel 234.00-138.00

EXHIBIT E-14

February 2021 photograph of well head in area of active dumping

Well head 221563



Photo taken in parcel 234.00-138.00

EXHIBIT F

Satellite image dated 3/23/1992 indicating illegal dumping has occurred in the parcels along Lawson Rd. for decades.



EXHIBIT G-1

Parcel 234-8.00-18.03 profile



SUSSEX COUNTY
DELAWARE

CONTACT US | 

Home | Property Records Search▼

Profile

Sales

Owners

Land

Agriculture

Residential

Outbuildings

Values

Permits

Sketch

Map

Documents

PARID: 234-8.00-18.03

ROLL: RP

MEISTEN WILLIAM T

Property Information

Property Location:

Unit:

City:

State:

Zip:

Class: AGR-Agriculture

Use Code (LUC): FP-AG PRESERVATION

Town: 00-None

Tax District: 234 - INDIAN RIVER

School District: 1 - INDIAN RIVER

Council District: 2-Green

Fire District: 77-Georgetown

Deeded Acres:

Frontage: 0

Depth: .000

Ir Lot:

Zoning 1: AR-1-AGRICULTURAL/RESIDENTIAL

Zoning 2: -

Plot Book Page: 162 92/PB

100% Land Value:

100% Improvement Value \$0

100% Total Value

1 of 1

Return to Search Results

Actions

 Printable Summary

 Printable Version

EXHIBIT G-2

Parcel 234-8.00-18.03 map



SUSSEX COUNTY

DELAWARE

[CONTACT US](#) | 

[Home](#) | [Property Records Search](#) ▼

[Profile](#)
[Sales](#)
[Owners](#)
[Land](#)
[Agriculture](#)
[Residential](#)
[Outbuildings](#)
[Values](#)
[Permits](#)
[Sketch](#)
[Map](#)
[Documents](#)

PARID: 234-8.00-18.03
MEISTEN WILLIAM T



Records Navigator

1 of 1

[Return to Search Results](#)

Actions

[Buffer Search](#)



2000 Feet

2000 Feet

2000 Feet

Sussex County Government | FirstMap

EXHIBIT G-3

No permits found for Parcel 234-8.00-18.03



SUSSEX COUNTY
DELAWARE

CONTACT US | ?

Home Property Records Search ▼

Profile
Sales
Owners
Land
Agriculture
Residential
Outbuildings
Values
Permits
Sketch
Map
Documents

PARID: 234-8.00-18.03

ROLL: RP

MEISTEN WILLIAM T

-- No Data --

1 of 1

Return to Search Results

Actions

Printable Summary

Printable Version

EXHIBIT G-4

Evolution of dumping in Parcel 234-8.00-18.03

June 2011

Forest healthy

No truck path or sludge pond



July 2015

Forest begins dying.

Truck path and apparent sludge pond appears.



Sludge pond
appears

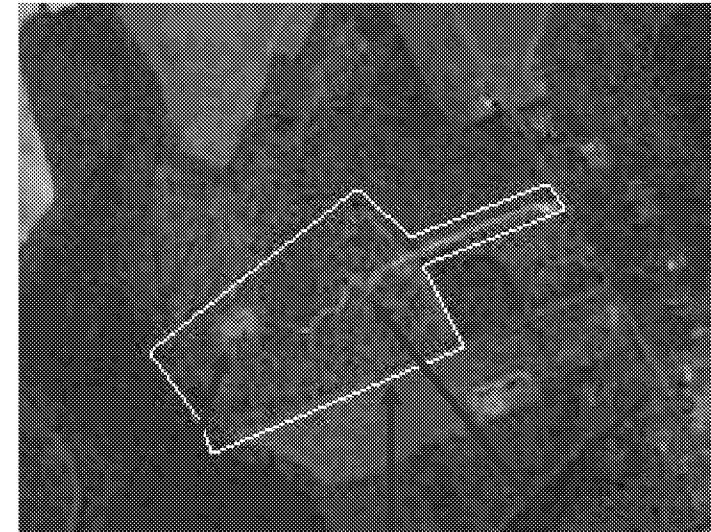
Forest begins
dying

Truck path
appears

April 2017

Forest in further decline.

Apparent sludge pond worsens.



Sludge pond
grows

Further decline
of forest

Truck path
expands

EXHIBIT G-5

Evolution of dumping in Parcel 234-8.00-18.03

April 2017
Visible effluent on surface



Inset of April 2017 satellite image showing visible effluent on the surface.



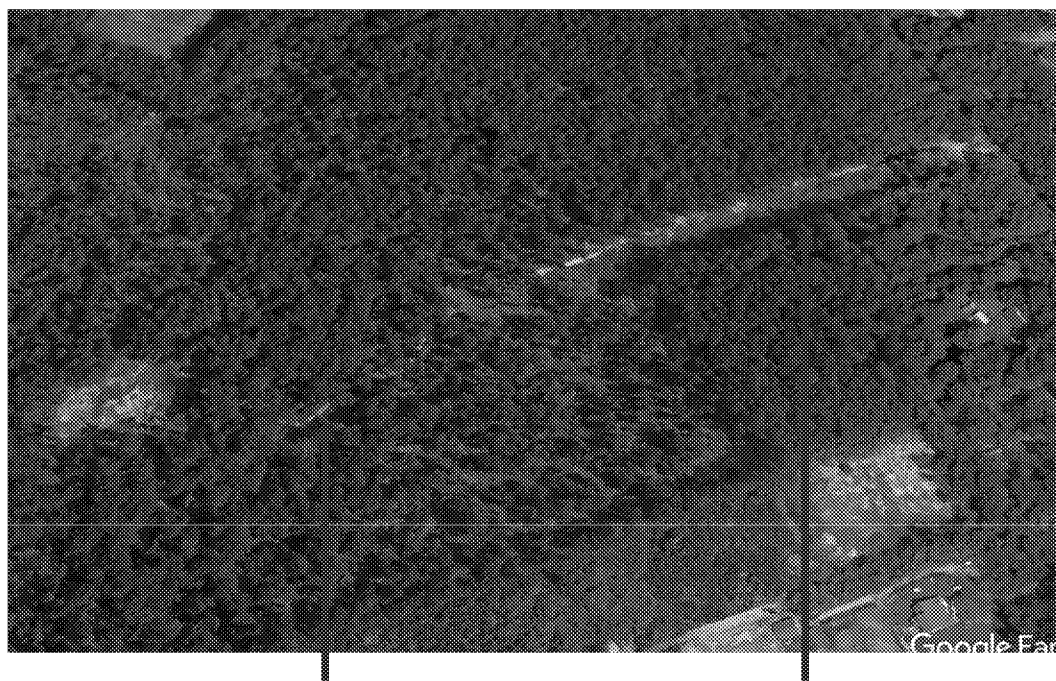
Visible effluent in apparent sludge pond

EXHIBIT G-6

Evolution of dumping in Parcel 234-8.00-18.03

Comparison of June 2018 satellite view showing recovery of truck path and October 2019 street view indicating further development of truck path and possible start up of dumping operation.

June 2018
Most recent satellite image



Woods recovering

Truck path recovering

October 2019
Truck path widens and becomes reestablished



Truck path reestablished

Fresh tracks

EXHIBIT H

Call log regarding U.S. EPA Case 1298294



Billing period

Jan 29, 2021 - Feb 28, 2021

Account number

[REDACTED]

Ex. 6 Personal Privacy (PP)

[REDACTED]

IPHONE 12 PRO

Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
[REDACTED]								
Feb 18	12:57 AM	800.424.8802	WIFI CL	Toll-Free, CL	41	--	--	--
Feb 18	1:39 AM	800.424.8802	WIFI CL	Toll-Free, CL	63	--	--	--
Feb 18	7:11 AM	215.514.8773	Rehoboth B, DE	Incoming, CL	13	--	--	--
Feb 18	7:24 AM	215.514.8773	Rehoboth B, DE	Phila, PA	4	--	--	--
Feb 18	7:27 AM	215.514.8773	Rehoboth B, DE	Phila, PA	12	--	--	--

EXHIBIT I

Images of dead animals and animal parts within and near parcels 234.00-138.00 and 234-21.00-139.00.

Dead raccoon



Deer leg



Dead cat

